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February 7, 2022

The Honorable Judge Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: 1:22-mc-000034 *In re Application of Carolina Andraus Lane* Request to Issue Additional  
Subpoena Naming Corporation as Deponent

Dear Judge Schofield:

I am counsel for the Applicant, Carolina Andraus Lane (hereinafter “Applicant”), in the above-captioned matter. I filed a motion for Discovery for use in Foreign Proceeding on Applicant’s behalf on February 3, 2022 (*See* Docket No. 1). The matter was assigned to you today, February 7, 2022, and an Order was entered directing Applicant to serve a copy of the order and the papers in support of the Application. (*See* Docket No. 8).

I am writing to respectfully request that the court permit Applicant to issue an additional subpoena naming Donald Fox and Rafael Urquia II of **Fox Horan & Camerini LLP** as a Deponents. Pursuant to Your Honor’s February 7, 2022 Order, Donald Fox shall permitted to object should he choose to do so.

The proposed subpoenas are attached hereto as Exhibit G and H.

This is a first request to issue an additional subpoena. We thank the Court for its time and effort in consideration of this matter.

Respectfully submitted,

/s/ Kadochnikov

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Alexander Kadochnikov, Esq.